

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

IN RE: AIR CRASH INTO THE JAVA SEA  
ON JANUARY 9, 2021

MDL No. 1:23-md-3072

This Document Relates To:

ALL CASES

**DEFENDANT THE BOEING COMPANY'S  
MOTION TO DISMISS FOR FORUM NON CONVENIENS**

Defendant The Boeing Company (“Boeing”), by and through undersigned counsel, respectfully moves this Court to dismiss all cases coordinated or consolidated for pretrial proceedings in favor of an Indonesian forum under the doctrine of *forum non conveniens*. The doctrine of *forum non conveniens* allows courts to dismiss actions brought in the United States where an alternative forum is adequate and available, and where it would be more convenient to litigate there. *See Piper Aircraft Co. v. Reyno*, 454 U.S. 235 (1981). As more fully explained in Boeing’s Memorandum in Support, Indonesia is an available and adequate forum, and the private and public interest convenience factors strongly favor of dismissal.

WHEREFORE, for the reasons stated above, as well in Boeing’s Memorandum in Support, Boeing respectfully requests that this Court dismiss all cases coordinated or consolidated for pretrial proceedings in favor of an Indonesian forum under the doctrine of *forum non conveniens*.

Dated: June 26, 2023

By: /s/ Benjamin L. Hatch

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Company*

**CERTIFICATE OF SERVICE**

I, Benjamin L. Hatch, hereby certify that on June 26, 2023, I filed the foregoing ***MOTION TO DISMISS FOR FORUM NON CONVENIENS*** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record.

/s/ Benjamin L. Hatch

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